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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

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**FILED**

DEC - 4 2019

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

MR. GRAMBLING T. DOMINIQUE, JR

Case No: 19 cv 2280

PLAINTIFF,

The Honorable Judge

VS

Manish S. Shah

ILLINOIS STATE TROOPER SNIDEY &

The Honorable Magistrate Judge

UNKNOWN DEFENDANT OFFICER

Young B. Kim

DEFENDANTS

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**PLAINTIFFS RESPONSE TO COUNSEL OF RECORD MOTION TO WITHDRAW**

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Pursuant to Local Rule 83.17, counsel for the Plaintiff, Blake W. Horwitz Esq and Robert Kroeger Esq, have motion this court to withdraw as counsel of record. In support of their motion the cite the following as reasons for their withdraw;

1. Irreconcilable Differences have arisen between Plaintiff and Counsel in this matter.
2. Plaintiff and Counsel have had several detailed conversations and communications via text messages.
3. Counsel for the plaintiff Blake W. Horwitz Esq, made Plaintiff aware or hid desire to withdraw on November 25, 2019.

Judge, the plaintiff disputes this claim by Counsel.

**BACKGROUND**

Judge, as the court is aware, this civil action is a result of an illegal arrest performed by the Defendant Snidey, Herein known as Defendant One, against the Plaintiff under the color of his authority. Defendant One also threaten to kill Plaintiff in open court. The Defendant also employed, persuaded, conspired with through a second party yet to be named the services of Defendant Two, The Unknown Officer, Herein known as Defendant Two for the purposes of this response, to make contact with the Plaintiff to intimidate and cause physical harm to him during and after his Acquittal on Defendant One manufactured

DUI Charges and the several others false charges he filed with the Cook County States Attorney Office for Prosecution, on April 4, 2018 but also, in effort to prove that Plaintiff was not Hearing impaired and, to intimidate Plaintiff into a plea in a pending Contempt of Court Case in the Circuit Court of Cook County with the assistance of a Corrupt Cook County State's Attorney who has yet to be named in this action.

## FACTS

As it pertains to counsel in the response to his motion to withdraw, there has been NO IRRECONCILABLE DIFFRENCEs between Counsel for the Plaintiff Blake W. Horwitz or Robert Kroeger that the Plaintiff is aware of. Look Judge, I'm no Attorney, I only know how to walk it like I talk it and tell the Goddamn truth. That's it. The following are the facts as I am aware of that is going on currently.

1. On November 24<sup>th</sup>, 2019 Counsel Blake W. Horwitz contacted me via text message and e-mail stating that Witness James Stewart who was a former Manager at The Restaurant Cindy's who witnessed and wrote the Incident Report on April 5<sup>th</sup>, 2019 documenting what actually occurred on that day during the attack on my person by Defendant Two in his Incident Report furnished to him by the restaurant he was employed at had spoken to our investigators hired by Counsel Blake Horwitz and was recanting his account of what he saw occur. He also said that I'm not hearing impaired. Mr. Horwitz claimed that this was a problem.
2. On June 12, 2019 I informed Counsel that Mr. Stewart had contacted me and stated that he had been called down to the Cook County States Attorney's Office in connection to his statement and now he wanted money to testify in this matter. I told Mr. Horwitz that I will not pay him for his testimony and provided Mr. Horwitz with the phone number and all of Mr. Stewart's information. Horwitz stated to me that he attempted to contact Mr. Stewart and in fact did reach him, and that Mr. Stewart told him, "quote, it's all good" unquote, which neither of us had a damn clue what that meant. Horwitz told me he attempted to contact him several time to no avail. So he was aware of Mr. Stewart wanting to be compensated after he was summed to the Cook County States Attorney's Office in no doubt a atmosphere of intimidation. So why he would Horwitz be surprised 6 months later that they got to him and intimidated him to change his true account is unbelievable to me.

*(Please find enclosed text msg. Judge this is Privileged conversation between myself and Mr. Horwitz)*

3. On Thursday April 5<sup>th</sup>, 2018 the day after I was acquitted of the false and illegal DUI Charges leveled against me by Defendant One, Witness Robert Woods, who was not only with me during the morning and afternoon of that day, he accompanied me to the Daley Center where the second part of this case begins with Defendant Two. Mr. Woods is an EYE WITNESS to the assault by DEFENDANT TWO. He is such a witness that he in-fact followed Defendant Two from my the

Lawyers office I went to that afternoon after I left court where Defendant Two got his instruction to engage in this plot against me, all east on Madison Avenue to the Target Store at State and Madison, observed Defendant Two, assault me in the store while standing in line then, he observed Defendant Two follow to the Hotel where he begin first altercation, Observed Mr. Stewart engage Defendant Two, the observed Defendant Two follow me to the underground parking garage and initiate a second altercation and assisted Mr. Stewart to break up the altercation with the assistance of two others. We also have an Eye Witness to the Threat lodge at me By Defendant One who was in the courtroom that day, saw the altercation afterwards and was there at the initial traffic accident where Defendant illegally arrested me is ready to testify. Her name is Jarkius Inglam.

4. Defendant One also created in effort to support his illegal arrest, He Filled out a VOLENTARY WITNESS FORM completely and submitted it as evidence of a witness who observed his positon to support his false police incident report he filed. Please find enclosed the VOLENTARY WITNESS REPORT HE FORGED and along with clear known copies of his hand writing in the way of the traffic tickets he filed out. If defense counsel wishes to have his client submit to providing several handwriting samples to a handwriting expert if there any doubt or question that will be fine. I am as of this writing instruction Mr. Horwitz to amend our complaint to reflect that as well.
5. Witness Stewart on Friday, April 6, 2019 contacted Assistant Cook County Public Defender Camille Durham because he was in possession of some of my personal items and COURT PAPERS FROM THE DAY PRIOR, APRIL 5<sup>th</sup>, 2018, which listed her as my attorney. He told her of the incident imitated by Defendant Two and asked her for my address so he can get me things back to me. On April 30, 2018, Ms. Durham related to me her conversation with Mr. Stewart and asked me what happen. I then went to the restaurant and asked me Stewart to be a witness in the Contempt matter and tell his involvement as to what he witnessed with respect to Defendant Two.
6. Judge, This action and that of the Pending State Case are intertwined. Mr. Horwitz is Counsel of record in both cases. Horwitz is also aware that the Assistant Cook County State's Attorney who was also the ASA of Record on the DUI Case that I was acquitted of had been trying to intimidate me and antagonize me into a physical fight. He is also personal friends with Defendant One to the point that during the DUI trial, after Defendant One finished testifying, he left the courtroom and the building without being released by the court. My Attorney had some additional questions for him and abolished and told the State Attorney to get him back here immediately.
7. Asa Bagnowski, who is an intricate part of this action and the ASA in question told the court that he would call Defendant Two on the telephone to find out where his whereabouts were. Bagnowski left the courtroom and called Defendant Two on his personal Phone. All of this is in the official transcript of that case. Bagnowski is also the States Attorney that Defendant One had bee conspiring with and who ALSO MANUFACTURED the circumstances of the pending INDIRECT CONTEMPT OF Court Case using his relationship with the Supervising Judge of the traffic Division, Dianne Marsalak. Judge Marslack, using her "Administrative Authority" over the other judges tampered with the Contempt Case to assist Bagnowski and even was caught on the record by PLAINTIFFS Co-Counsel Mr. Kroeger GIVEN AN "ADMINISTRATIVE ORDER" TO A SITTING Cook

County Circuit Court Judge, ON THE BENCH IN THE MIDDLE OF COURT CALL, to vacate an already adjudicated order for me to have my right to a jury trial in this Contempt Case. Mr. Kroeger submitted a formal complaint to the JBI (Judicial Board Inquiry) as I did in regards to this incident.

#### OPINION

Judge, these are the facts as I know them, The above parties mention above are or should be a part of this action and are known to Mr. Horwitz and they are not. There has been discussion but at no time has there been any Irreconcilable Differences as stated by Counsel. In fact, I cannot see how Mr. Horwitz can claim that he finds a problem with Mr. Stewarts recanting his true account but recanting all the same when he cannot only substantiated by Officers of the court but Two EYE WITNESSES?

Secondly, Mr. Horwitz has claimed to be following a particular strategy which is not known to this plaintiff. He is also counsel of record in the State Case pending in the Circuit Court of Cook County where these same very facts well be presented and he is deeply involved with. He has subpoenaed video in which the Cook County Government, Sheriff Department, and The States Attorney's office as well as at least 4 judges one former will be called to testify in this matter if not be amended defendants to this action, YES JUDGE ITS JUST THAT DEEPLY INVOLVED. The corruption involving this complaint and the issues 'I've outlined is corruption on a scale that reviles the Old First Ward Alderman Pat Marcy stronghold over the judges of the Circuit Court of Cook County of the 80s when they were fixing cases. That exactly what you have here judge. This is all going to come out no more in the closets crap. The truth and who's behind it and who is responsible and what they did to me is coming out in this action. NONE OF THEM ARE GETTING AWAY WITH WHAT THEY DID TO ME> NOT ONE GODDAMN ONE OF THEM. His absent from this case will be a deep hardship to the outcome of it. To introduce another lawyer to this matter, to bring him up to speed, to try to have him follow what Mr. Horwitz strategy is and to get him on the ball will be a devastating blow to this case.

#### CONCLUSION

Judge, I am unaware of any conflict that Mr. Horwitz is alluding to in his motion. I as the court to deny his motion to withdraw and to instruct him to proceed with the matrix of this complex case. The truth is the truth, That's the only way I walk it.

  
Mr. Grambling T. Domingue Jr.  
4 December, 2019